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Counsel for Defendant
Jizhong Chen

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES,

Plaintiff,

vs.

JIZHONG CHEN,

Defendant.

Case No. CR 19-00056 EJD

**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE STATUS CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED between the Government, through Assistant United States Attorney Marissa Harris, and Defendant Jizhong Chen, through his attorney Daniel Olmos, that the status hearing in this matter be continued from January 31, 2022, to March 28, 2022, at 1:30 p.m.

This is a complex case with voluminous discovery, and the government has informed the defense that it intends to produce additional discovery which the defense will need time to review. Further, the defense has lodged a sealed subpoena duces tecum pursuant to Federal Rule of Criminal Procedure 17(c) with a compliance date of March 28, 2022.

The parties agree that the time between January 31, 2022, and March 28, 2022, should be excluded from calculations under the Speedy Trial Act, which excludes delay when the interests of

1 justice in allowing for the effective preparation of the defense outweigh the best interest of the public
2 and the defendant in a speedy trial, taking into account the exercise of due diligence. 18 U.S.C. §§
3 3161(h)(7)(A) and (B)(iv).

4 For the foregoing reasons, the parties stipulate to continue the status conference to March 28,
5 2022.

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7 IT IS SO STIPULATED

8 Dated: January 26, 2022

NOLAN BARTON & OLMOS LLP

9 /S/ Daniel B. Olmos

10 Daniel B. Olmos

11 Attorney for Defendant Jizhong Chen

12
13
14 Dated: January 26, 2022

Stephanie Hinds, United States Attorney

15 /S/ Marissa Harris

16 By: Marissa Harris

17 Assistant United States Attorney
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3 **UNITED STATES DISTRICT COURT**
4 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
5 **SAN JOSE DIVISION**
6

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8 UNITED STATES,

9 Plaintiff,

10 v.

11 JIZHONG CHEN,
12

13 Defendant.
14

Case No. CR 19-00056 EJD

**[PROPOSED] ORDER TO CONTINUE
STATUS CONFERENCE**

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16 GOOD CAUSE APPEARING, it is hereby ordered that the status conference currently
17 scheduled for January 31, 2022, be continued to March 28, 2022, at 1:30 p.m. Based upon the
18 representation of counsel and for good cause shown, the Court also finds that the time between
19 January 31, 2022, through and including March 28, 2022, shall be excluded from calculations under
20 the Speedy Trial Act. The interests of justice in allowing for the effective preparation of the defense
21 and continuity of counsel outweigh the best interest of the public and the defendant in a speedy trial,
22 taking into account the exercise of due diligence. 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).
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24 Dated:

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The Hon. Edward J. Davila
26 United States District Judge
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